

Exhibit 24

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This document relates to: Polster

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.

Case No. 18-OP-45090

City of Cleveland, Ohio v. Purdue  
Pharma L.P., et al

Case No. 18-OP-45132

The County of Summit, Ohio, et al.  
v. Purdue Pharma L.P., et al.

Case No. 17-OP-45004

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Videotaped deposition of
CHERI WALTER

February 19, 2019

9:04 a.m.

Taken at:

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1 dollar budget deficit that the state had --
2 strike that.

3 In the next paragraph of the
4 document it says, "Ohio now recognizes that
5 lives are being lost and budgets are being
6 decimated by heroin and other opiate abuse,
7 related criminality and societal costs."

8 Do you see that?

9 A. I'm sorry. Where are you at?

10 Q. Oh, I'm sorry. In the second
11 paragraph of "Background."

12 A. Yes, I see that.

13 Q. And is that an accurate statement as
14 of 2011?

15 A. Yeah, I would say that was.

16 Q. And Ohio, that means counties and
17 cities across the state, correct?

18 MS. KEARSE: Object to form.

19 A. That would be my understanding, yes.

20 Q. Was that your experience at the
21 time?

22 A. Yes.

23 Q. And so the epidemic of heroin and
24 opiate addiction, in your experience that was
25 not just limited to one or two counties, it was

1 something affecting the entire state?

2 MS. KEARSE: Object to form.

3 A. That's correct.

4 Q. So if you flip over to page 500, in
5 the first full paragraph there it says, "To help
6 move Ohio forward in addressing the OPDATF
7 recommendations and the widely perceived
8 deficits in treatment modalities for opiate
9 addiction, we are planning a second conference,
10 a part 2 to the March 2010 conference,
11 "Medication-Assisted Treatment: Putting the
12 Brakes on the Opiate Epidemic."

13 Did I read that correctly?

14 A. You did.

15 Q. So do you have an understanding of
16 what the reference to "widely perceived deficits
17 in treatment modalities for opiate addiction"
18 means?

19 A. Well, yes. I think at this time
20 medication-assisted treatment was just becoming
21 the norm. We didn't have enough trained doctors
22 across the state of Ohio. We didn't have enough
23 treatment facilities that were using
24 medication-assisted treatment. So I believe
25 that's what that references to, and there were

1 boards, who send it out to all of their
2 providers. We send it to the provider
3 organization. All of those people that were on
4 that steering committee, I'm sure we would have
5 asked them, when it was time to register, to
6 send it out as well.

7 Q. And when you say send it out through
8 partners, who are the partners you're referring
9 to?

10 A. For the most part, the people that
11 were on that steering committee. There may have
12 been another partner here that are asked, like
13 oftentimes I ask the county commissioners to
14 send some out, things like that, just whomever I
15 thought could get it out to people that might
16 have been appropriate to attend.

17 Q. So as the CEO of OACBHA, which was
18 putting on this conference, was it your
19 understanding that Ohio was, in fact, suffering
20 from an opiate epidemic in 2011?

21 MS. KEARSE: Object to the form.

22 A. Yes.

23 Q. And that the opiate epidemic was not
24 limited at that time -- strike that.

25 And that the opiate epidemic was not

1 limited to particular counties or areas of the
2 state?

3 MS. KEARSE: Object to form.

4 A. It may not have been in each of the
5 88 counties, but it certainly wasn't limited to
6 one area. It was across the state.

7 Q. What's the basis of that
8 understanding?

9 A. Working with my directors and
10 reading, talking to people. I mean, this is my
11 profession.

12 Q. We talked earlier about the OACBHA
13 membership meetings.

14 A. Um-hum.

15 Q. Was the opiate epidemic a topic of
16 discussion at those meetings around this time in
17 2011?

18 A. I can only guess that it was. I
19 mean, I don't remember off the top of my head
20 each meeting, but we would have talked about the
21 upcoming conference. We may well have had --
22 talked about who they thought should present.
23 So yes, I would believe. And plus with the
24 budget, yeah.

25 Q. So the conference would have been